

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

CATHERINE ALEXANDER,)
Plaintiff,)
-vs-)
TAKE-TWO INTERACTIVE SOFTWARE, INC.,)
2K GAMES, INC.; 2K SPORTS, INC.; WORLD)
WRESTLING ENTERTAINMENT, INC.;)
VISUAL CONCEPTS ENTERTAINMENT;)
YUKE'S CO., LTD.; AND YUKE'S LA INC.,)
Defendants.)
Case No. 3:18-cv-966-MJR-DGW

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE RESPONSE TO PLAINTIFF'S COMPLAINT**

1. Defendant WORLD WRESTLING ENTERTAINMENT, INC. (“WWE”), by and through its Attorneys, JERRY McDEVITT and CURTIS KRASIK of K&L GATES LLP, pursuant to Federal Rule of Civil Procedure 6, hereby moves this honorable Court for an extension of time of 60 days (from May 10, 2018 to July 9, 2018) to file a response to Plaintiff CATHERINE ALEXANDER’s (“Plaintiff”) Complaint. In support thereof, WWE states as follows:

2. On April 17, 2018, Plaintiff, an individual resident of Illinois, filed her Complaint alleging that Defendants infringed certain copyrights by creating the video game series *WWE 2K*. [Doc. 1].

3. On April 19, 2018, WWE was served. [Doc. 16]. WWE's response is currently due on May 10, 2018.

4. Due to the nature and complexity of the case, WWE respectfully requests an extension of time of 60 days (from May 10, 2018 to July 9, 2018) to file a response to Plaintiff's Complaint.

5. Counsel for WWE contacted counsel for Plaintiff regarding the requested extension. Counsel for Plaintiff stated that they have no objection to this extension.

6. The Court recently granted a similar motion filed on behalf of Defendants Take-Two Interactive Software, Inc., 2K Sports, Inc., 2K Games, Inc., and Visual Concepts Entertainment (collectively, the "Take-Two Defendants"), extending the Take-Two Defendants' time to respond to Plaintiff's Complaint by 60 days (from May 10, 2018 to July 9, 2018). [Doc. 35]. WWE respectfully requests that it be granted the same extension of time granted to the Take-Two Defendants such that WWE's and the Take-Two Defendants' responses to Plaintiff's Complaint would all be due on July 9, 2018.

7. This motion is made in good faith and is not intended to cause undue delay.

WHEREFORE, for the above and foregoing reasons, WWE respectfully requests this honorable Court grant it an extension of time to file a response as stated herein.

Dated: May 10, 2018

Respectfully submitted,

/s/ Curtis B. Krasik

Jerry McDevitt (*pro hac vice*)
Curtis Krasik (*pro hac vice*)
K&L Gates LLP
210 Sixth Avenue
Pittsburgh, PA 15222
Telephone: (412) 355-8696
Jerry.McDevitt@klgates.com
Curtis.Krasik@klgates.com

Attorneys for Defendant World Wrestling Entertainment, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2018, I electronically filed the foregoing **Unopposed Motion for Extension of Time to File Response to Plaintiff's Complaint** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Anthony G. Simon asimon@simonlawpc.com
Benjamin R. Askew baskew@simonlawpc.com
Anthony R. Friedman afriedman@simonlawpc.com
R. Seth Crompton scrimpton@allfela.com

Counsel for Plaintiff

Dale M. Cendali dale.cendali@kirkland.com
Joshua L. Simmons joshua.simmons@kirkland.com

Counsel for Take-Two Defendants

/s/ *Curtis B. Krasik*

Curtis B. Krasik
K&L Gates LLP
210 Sixth Avenue
Pittsburgh, PA 15222
Telephone: (412) 355-8696
Curtis.Krasik@klgates.com
*Attorney for Defendant
Entertainment, Inc.*